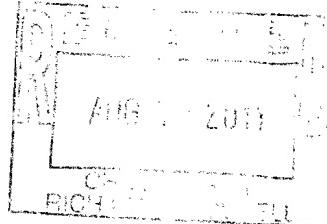
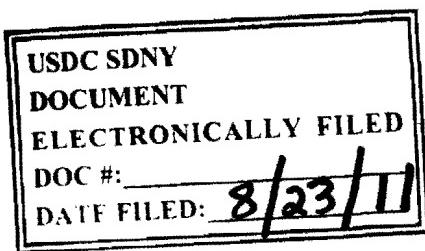


# Lowenstein Sandler

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August 17, 2011



**VIA FACSIMILE (212-805-7948)**

Hon. Richard J. Holwell, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: Copantitla, et al. v. Fiskardo Estiatorio, Inc. d/b/a Thalassa Restaurant, et al.**  
**Case No. 09-Civ.-1608**

Dear Judge Holwell:

This firm represents defendants in the referenced case. We submit this letter jointly with plaintiffs' counsel to respectfully request a one week extension for the submission of the joint pre-trial order (including proposed findings of fact and conclusions of law and a pretrial memorandum, which are due at the same time as the joint pretrial order per Your Honor's individual practices) and the designation and counter-designation of deposition testimony for use at trial. Trial in this matter is currently scheduled to begin on September 19, 2011. Under the Revised Scheduling and Trial Order [Doc. No. 122] and the Court's individual practices, the joint pretrial order (along with proposed findings and conclusions and pretrial memorandum) and designated deposition testimony is to be exchanged and provided to chambers this Friday, August 19, 2011. Counter-designations and objections to designations are currently due August 26, 2011.

The parties are diligently preparing for trial in this matter and met yesterday to discuss stipulations to facts and wage-and-hour damages. We are nearing agreement on stipulated facts and possibly wage and hour damages. However, the parties require additional time to negotiate and receive approval from their clients. Therefore, in the interests of streamlining the issues for trial and providing the Court with submissions that can fully encompass the parties' agreements, we respectfully request an extension.

If the Court grants the parties' an extension, the joint pretrial order (and proposed findings and conclusions and pretrial memorandum) and designated deposition testimony will be due on August 26, 2011; counter-designations and objections to designations will be due on September 2, 2011.

Hon. Richard J. Holwell, U.S.D.J.  
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We thank the Court for its attention to this matter.

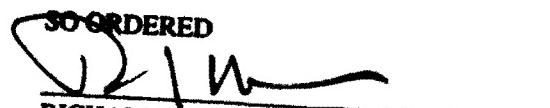
Respectfully submitted,

*David W. Field/ef*

David W. Field

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cc: David Colodny, Esq.  
Daniel Lewis, Esq.  
Marc Ashley, Esq.  
Meghan Towers, Esq.

SO ORDERED  
  
RICHARD J. HOLWELL  
UNITED STATES DISTRICT JUDGE  
8/17/11

**Lowenstein**  
**Sandler**  
ATTORNEYS AT LAW